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Via ECF and hand delivery

February 1, 2018

Hon. Debra Freeman
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St., Courtroom 17A
New York, NY 10007

Re: Carlos M. Salas et al. v. Peter Salas et al.,
Case No.: 16-cv-2248

Dear Magistrate Judge Freeman:

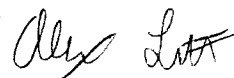
We represent Plaintiffs Carlos M. Salas and Ada Cristina Salas in the above captioned matter and respectfully submit this letter motion to renew Plaintiffs' prior motion seeking to compel Defendants to produce documents and for sanction for Defendants' conduct (See Doc. No. 20).

Pursuant to the Court's Order dated January 16, 2018, on January 24, 2018, the parties held a conference call to confer regarding Plaintiffs' outstanding document requests. During that conference, Defendants' counsel stated which documents they intended to produce, which was memorialized in the annexed letter. However, Defendants' counsel has only produced a full copy of the 2005 Dolphin Offshore Partners Financial statements that was previously produced as a partial copy of the.

Accordingly, Plaintiffs respectfully renew their request that the Court order Defendants to produce such documents and sanction Defendants for the repeated tactics.

We thank the Court for its attention to this matter.

Respectfully submitted,



Alex Litt

Enclosures

cc: Daniel Osborn, Esq. (via ECF and email)
Attorney for Defendants

New York, NY ■ Los Angeles, CA ■ Stamford, CT ■ Washington, DC ■ Newark, NJ ■ Philadelphia, PA